

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

In Re:

Kieu T. Trinh,

Debtor

Case No. 14-32920-HCD

Objection to Chapter 13 Plan

Wild Wing Plantation Home Owners Association, Inc., by counsel, objects to the Debtor's Chapter 13 Plan on the following grounds:

1. At the Section 341 first meeting of creditors, the Debtor and her counsel stated to the Chapter 13 Trustee's office that Schedule I would have to be amended to more accurately reflect the Debtor's income.
2. At the first meeting of creditors, counsel for the Home Owners Association notified the Debtor and her counsel along with the Chapter 13 Trustee's office that Schedule J omitted the ongoing expense of the association dues. (The dues are paid quarterly by the Debtor in the amount of \$620, or \$206.67 per month.)
3. The Schedules I and J (as filed) reflect monthly income and expenses that are near enough to each other that the omission of the monthly association dues could render the Debtor's plan unfeasible.
4. As of February 13, 2015 at the time this objection is filed, the Debtor has not filed an amended Schedule I or J. The Home Owners Association has not had the opportunity, therefore, to examine the feasibility of the Chapter 13 Plan.
5. Therefore, the Home Owners Association objects to confirmation of the Plan.

Respectfully submitted,

/s/ William L. Wilson

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Certificate of Service

I hereby certify a copy of the foregoing was served upon Michael P. Connors and David H.K. Nguyen, counsel for the Debtor, Debra Miller, Chapter 13 Trustee, Mark E. Wagner, counsel for 1st Source Bank, and any other attorney or party who has appeared in this case by way of notice generated and emailed to them by the Court's ECF system on February 13, 2015..

/s/ William L. Wilson

William L. Wilson